

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF MASSACHUSETTS
CENTRAL DIVISION**

**IN RE:
DAVID E. GRAVLIN, JR.**

**Chapter 13
Case no. 17-41714-CJP**

**DEBTOR'S OBJECTION TO THE MOTION TO DISMISS
CHAPTER 13 FILED BY LORA A. FICKETT**

NOW COMES the Debtor, David E. Gravlin, Jr., by his counsel, to respond and object to the Motion to Dismiss filed by Lora A. Fickett. In support therefore the Debtor states the following:

1. The Debtor denies the statements contained in Paragraph 1. The Debtor filed this Chapter 13 in good faith to provide for payment in full of his past due child support.
2. The Debtor denies the statements contained in Paragraph 2. The Debtor believes that this Plan is in the best interest of all creditors, including Ms. Fickett.
3. The Debtor denies the statements contained in Paragraph 3. The Debtor further states that this Plan, as proposed, is confirmable. The Debtor further states that the Plan has not yet been confirmed primarily due to ongoing disputed Proofs of Claim filed by Ms. Fickett.
4. The Debtor denies the statements contained in Paragraph 4. The Debtor further state that he is current on all post-petition domestic support obligations.
5. The Debtor denies the statements contained in Paragraph 5. The Debtor's income, in its entirety, is reflected on Schedule I.

WHEREFORE, the Debtor respectfully requests that this Court deny the Motion to Dismiss.

Respectfully Submitted,
David E. Gravlin, Jr.,
By his counsel,

/s/ Wendy M. Mead
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DATED: March 21, 2018

CERTIFICATE OF SERVICE

I, Wendy M. Mead, hereby certify that, on March 21, 2018, I served a true and correct copy of the foregoing document by first class mail, postage prepaid, upon each of the parties listed below not noted as having received electronic notice on the electronic filing receipt.

/s/ Wendy M. Mead

Wendy M. Mead

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